

Exhibit 7

**Redacted Version of
Document Sought to
be Sealed**

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IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

CHASOM BROWN, WILLIAM BYATT,)
JEREMY DAVIS, CHRISTOPHER CASTILLO,))
and MONIQUE TRUJILLO, individually)
and on behalf of all others)
similarly situated,)
Plaintiffs,)
) Case No.:
vs.) 5:20-cv-03664-LHK-SVK
)
GOOGLE, LLC,)
Defendant.)
_____)

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VIDEO-RECORDED REMOTE DEPOSITION OF STEVE GANEM
Huntington Beach, California
Wednesday, March 23, 2022; 12:37 p.m.

REPORTED BY:
Victoria A. Guerrero, CSR, RPR, RMR, CRR
Job No. 5130916
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1	IN THE UNITED STATES DISTRICT COURT	1	INDEX TO EXAMINATION
2	NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION	2	WITNESS: STEVE GANEM
3		3	
4	CHASOM BROWN, WILLIAM BYATT,)	4	EXAMINATION: PAGE LINE
5	JEREMY DAVIS, CHRISTOPHER CASTILLO,) and MONIQUE TRUJILLO, individually)	5	By Ms. Nyborg-Burch 7 14
6	and on behalf of all others)	6	
7	similarly situated,)	7	* * *
8	Plaintiffs,)	8	
9) Case No :	9	
10	vs) 5:20-cv-03664-LHK-SVK	10	
11)	11	
12	GOOGLE, LLC,)	12	
13	Defendant)	13	
14)	14	
15	_____)	15	
16		16	
17	BE IT REMEMBERED that, pursuant to Federal	17	
18	Rules of Civil Procedure, the deposition of STEVE	18	
19	GANEM was taken before Victoria A Guerrero,	19	
20	California Certified Shorthand Reporter, Registered	20	
21	Merit Reporter, and Certified Realtime Reporter, on	21	
22	Wednesday, March 23, 2022, commencing at the hour of	22	
23	12:37 p m , the witness responding to questions by	23	
24	videoconference from Huntington Beach, California;	24	
25	the questions being propounded and proceedings	25	
	reported remotely via videoconference		
	Page 2		Page 4
1	REMOTE APPEARANCES:	1	INDEX TO EXHIBITS
2		2	STEVE GANEM
3	FOR THE PLAINTIFFS:	3	Brown, et al. vs. Google
4	BOIES SCHILLER FLEXNER	4	Wednesday, March 23, 2022
5	ERIKA NYBORG-BURCH	5	Victoria A. Guerrero, CSR, RPR, RMR, CRR
6	BEKO REBLITZ-RICHARDSON	6	
7	MARK MAO	7	MARKED DESCRIPTION PAGE LINE
8	44 Montgomery Street, 41st Floor	8	Exhibit 1 Life of a Visit; 28 9
9	San Francisco, California 94104	9	GOOG-BRWN-00026812 through
10	T 415 293 6800	10	26830
11	enyborg-burch@bsflp com	11	
12	brichardson@bsflp com	12	Exhibit 2 Google Analytics: Starting 41 15
13	mmao@bsflp com	13	Conversation;
14		14	GOOG-CABR-00381312 through
15	FOR THE PLAINTIFFS IN "CALHOUN V GOOGLE":	15	00381576
16	BLEICHMAR FONTI AND AULT	16	Exhibit 3 Declaration of Steve Ganem 60 1
17	ANGELICA M ORNELAS	17	Regarding Google Analytics in
18	555 12th Street, Suite 1600	18	Opposition to Plaintiffs'
19	Oakland, California 94607	19	Motion for Class Certification
20	T 415 445 4011	20	(No Bates)
21	aornelas@bfalaw com	21	Exhibit 4 Slide deck produced by 71 10
22		22	S. Pothana; GOOG-BRWN-00550613
23	FOR THE DEFENDANTS:	23	through 00550644
24	QUINN EMANUEL URQUHART & SULLIVAN, LLP	24	Exhibit 5 6/25/21 email to S. Pothana 91 9
25	ALY OLSON	25	from S. Ganem;
	STEPHEN BROOME		GOOG-BRWN-00597920 through
	865 Figueroa Street, Tenth Floor		00597922
	Los Angeles, California 90017		
	T 213 443 3000 F 213 443 3100		
	alyolson@quinnemanuel com		
	stephenbroome@@quinnemanuel com		
			* * *
	ALSO PRESENT:		
	Matthew Gubiotti, Google in-house counsel		
	Sean Grant, Videographer		
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1	the data they're supplying is kept separated from	15:56:13	1	A	It's a User ID baseview	15:59:55
2	the signed-out pseudonymous dataset.	15:56:18	2	Q	And so the reference here where it says,	16:00:00
3	So this is a discussion about technologies	15:56:22	3		Assuming UID is stored in anonymous baseview today,	16:00:02
4	we could apply to make it actually impossible for	15:56:27	4		is that saying that [REDACTED] is currently stored in	16:00:09
5	Google to ever do anything, combine their dataset,	15:56:32	5		anonymous baseview?	16:00:14
6	this signed-in dataset with the signed-out	15:56:39	6	A	I was actually unclear of that And in	16:00:26
7	pseudonymous dataset.	15:56:44	7		this thread aimed to get clarity on that subject	16:00:30
8	So I -- sorry. Go ahead.	15:56:48	8	Q	And do you have clarity now on that	16:00:35
9	Q Go ahead. Sorry. No, I interrupted you.	15:56:49	9		subject?	16:00:36
10	A So this statement you're referring to about	15:56:53	10	A	Yes I believe that the User ID itself is	16:00:46
11	using encryption is a mechanism that would enable us	15:56:54	11		also stored as metadata in the anonymous baseview	16:00:53
12	to meet our customer's expectations around	15:56:57	12		today which enables us to, among other things,	16:01:01
13	separation of that data.	15:56:59	13		export it to big query, which is for our customers	16:01:05
14	Q And so going back where you were speaking	15:57:05	14		to be able to perform custom processing and analysis	16:01:10
15	about the [REDACTED] being enabled, what is an [REDACTED]?	15:57:08	15		on their data	16:01:13
16	A [REDACTED]	15:57:28	16	Q	And the message From Sree Pothana at	16:01:18
17	[REDACTED]	15:57:33	17		14:50:52 where it says, Problem is we don't encrypt	16:01:24
18	[REDACTED]	15:57:36	18		it today	16:01:29
19	[REDACTED]	15:57:39	19		Is the "it" there in reference to the UID?	16:01:29
20	[REDACTED]	15:57:46	20	MS OLSON:	Objection Lacks foundation	16:01:35
21	[REDACTED]	15:57:53	21		Calls for speculation	16:01:40
22	Q [REDACTED]	15:57:54	22	THE WITNESS:	I'm not sure	16:01:46
23	[REDACTED]	15:58:03	23	BY MS NYBORG-BURCH:		16:01:47
24	[REDACTED]?	15:58:07	24	Q	And where you said, Sure, but we could	16:01:47
25	A This is something that's still in	15:58:09	25		start; do you know what you were referring to, right	16:01:49
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1	discussion. We haven't finalized.	15:58:10	1		below?	16:01:54
2	MS. OLSON: I'm just going to take the	15:58:17	2	A	I believe I interpreted her response to	16:02:10
3	opportunity to designate the transcript as	15:58:18	3		mean that User ID is stored in the Client ID space	16:02:12
4	Confidential.	15:58:20	4		unencrypted today.	16:02:18
5	MS. NYBORG-BURCH: Okay. I think we'll do	15:58:23	5	Q	And do you see where Sree Pothana wrote	16:02:23
6	the same as we've done before where you'll follow up	15:58:24	6		later down, that, We still will have historical data	16:02:26
7	later with specific designations?	15:58:27	7		that is not encrypted and joinable. Just two lines	16:02:31
8	MS. OLSON: That process relates to	15:58:34	8		down.	16:02:36
9	Attorneys' Eyes Only designations; but yes, we'll do	15:58:35	9	A	Yes.	16:02:38
10	that.	15:58:38	10	Q	What was not encrypted -- what historical	16:02:39
11	MS. NYBORG-BURCH: Yes. Okay. You're	15:58:42	11		data was not encrypted and joinable?	16:02:42
12	right. Thank you, Aly.	15:58:43	12	MS. OLSON:	Objection. Calls for	16:02:47
13	BY MS. NYBORG-BURCH:	15:58:44	13		speculation.	16:02:48
14	Q So the question was whether you had	15:58:45	14	THE WITNESS:	See, this -- there's an	16:02:50
15	testified that anonymous baseview is where the	15:58:58	15		existing feature, which is User ID, which is not	16:02:51
16	Client ID is stored.	15:59:02	16		separately encrypted from the rest of Analytics	16:02:57
17	A Yes, that's correct.	15:59:08	17		today and is not -- we don't communicate any	16:03:02
18	Q And is anonymous baseview also where the	15:59:10	18		expectation that it would be to customers.	16:03:06
19	UID is stored?	15:59:17	19		And so Sree's statement that, We will have	16:03:09
20	MS. OLSON: Objection. Lacks foundation.	15:59:28	20		historical data that's not encrypted and joinable,	16:03:14
21	THE WITNESS: There is separate storage	15:59:42	21		just reflects the current state of the product.	16:03:17
22	where we -- a parallel storage where we keep User ID	15:59:44	22	BY MS. NYBORG-BURCH:		16:03:20
23	key data.	15:59:50	23	Q	And would that historical data be joinable	16:03:20
24	BY MS. NYBORG-BURCH:	15:59:52	24		with a [REDACTED]?	16:03:23
25	Q And what is that storage?	15:59:52	25	MS. OLSON:	Objection. Calls for	16:03:27
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1 speculation. 16:03:28	1 settings and the fact that we have time to launch 16:06:17
2 THE WITNESS: This is a thread from nine 16:03:29	2 the feature which make this point or this concern 16:06:20
3 months ago. And my understanding is that this is -- 16:03:32	3 moot. So there will be no concern about 16:06:23
4 first of all, the feature has not launched. So 16:03:40	4 joinability. And some questions about where a join 16:06:29
5 we're talking speculatively about the behavior of a 16:03:44	5 could occur, to me, seem irrelevant. 16:06:32
6 still-to-be-implemented feature. 16:03:47	6 BY MS. NYBORG-BURCH: 16:06:34
7 And then additionally, this is something 16:03:50	7 Q Sure. It may be irrelevant, but my 16:06:35
8 that we are -- we are addressing with the design, I 16:03:54	8 question is, in the context of this document, where 16:06:37
9 believe. So if and when this new feature does come 16:03:59	9 was the concern that joins would occur back in June 16:06:39
10 to light and if encryption of this data is something 16:04:04	10 of 2021? 16:06:43
11 that we believe our customers would demand, if we 16:04:08	11 MS. OLSON: Objection. Asked and answered. 16:06:51
12 promised that we will do it, we will do it. 16:04:13	12 Calls for speculation. And mischaracterizes the 16:06:51
13 BY MS. NYBORG-BURCH: 16:04:16	13 document. 16:07:01
14 Q And do you know in the statement, we will 16:04:16	14 THE WITNESS: Sorry. I'm still not 16:07:13
15 have historical data that is not encrypted and 16:04:19	15 following. I'm hung up on this -- I really will 16:07:14
16 joinable, do you know where this join would happen? 16:04:22	16 just end up repeating myself, that there is no 16:07:16
17 MS. OLSON: Objection. Calls for 16:04:27	17 actual concern of joinability and you're asking 16:07:19
18 speculation. 16:04:27	18 where joins could occur. 16:07:22
19 THE WITNESS: To say that something is 16:04:31	19 BY MS. NYBORG-BURCH: 16:07:23
20 joinable is not to say something will be joined. 16:04:32	20 Q So let's turn to the page ending in 9 -- 16:07:24
21 Often in Google we go to great lengths to make joins 16:04:38	21 MS. OLSON: This is actually a good 16:07:28
22 impossible. So that any speculation that Google 16:04:43	22 stopping point. It's been about another hour. 16:07:29
23 would do some joining would be, on their face, false 16:04:46	23 MS. NYBORG-BURCH: We'll just finish this 16:07:32
24 because it would be literally impossible. 16:04:52	24 document and we'll stop. I'm almost done. 16:07:33
25 /// 16:04:53	25 /// 16:07:35
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1 BY MS. NYBORG-BURCH: 16:04:55	1 BY MS. NYBORG-BURCH: 16:07:39
2 Q Let me rephrase. Do you know in this 16:04:59	2 Q Do you see where Sree wrote, At least we 16:07:39
3 statement, do you know where this join could happen, 16:05:01	3 have options to think through without expensive 16:07:41
4 not that Google would do it? 16:05:06	4 rewrites? And you wrote, Exactly, but is that the 16:07:46
5 MS. OLSON: Objection. Asked and answered. 16:05:09	5 only potential join key? Do you see that? 16:07:49
6 Calls for speculation. 16:05:11	6 A I do. 16:07:54
7 THE WITNESS: No. There is no process that 16:05:17	7 Q What was the potential join key being 16:07:54
8 would aim to join these things. This discussion is 16:05:18	8 referred to there? 16:07:56
9 about how making it so that even in theory such a 16:05:24	9 MS. OLSON: Objection. Calls for 16:08:01
10 join would not be possible. 16:05:27	10 speculation. 16:08:02
11 BY MS. NYBORG-BURCH: 16:05:28	11 THE WITNESS: This is a reference to [REDACTED] 16:08:09
12 Q Right. And I understand that this 16:05:29	12 and UID. 16:08:12
13 conversation is, in part, about that. My question 16:05:31	13 BY MS. NYBORG-BURCH: 16:08:16
14 was, where Sree wrote, We still will have historical 16:05:34	14 Q And so the join key would be between a UID 16:08:16
15 data that is not encrypted and joinable, and this 16:05:41	15 and an [REDACTED]? 16:08:20
16 was a concern, where was -- where would that join be 16:05:44	16 A The UID, in theory; but again, it was 16:08:32
17 able to happen? Not where would Google perform a 16:05:50	17 rendered moot. Could, without any changes, 16:08:37
18 joining of that data. 16:05:55	18 potentially be a join key between the [REDACTED] space, 16:08:41
19 MS. OLSON: Objection to the 16:05:57	19 which doesn't exist yet, and the pseudonymous 16:08:47
20 characterization of the document and calls for 16:06:00	20 baseview. 16:08:51
21 speculation. 16:06:02	21 And the concern was resolved in this 16:08:55
22 THE WITNESS: I think if you read the 16:06:07	22 thread. And you'll see that Sree answers in the 16:08:58
23 document in context and in total you'll see that the 16:06:08	23 next question that there are no other potential join 16:09:01
24 issue is not actually practical. 16:06:10	24 keys rendering the whole discussion resolved, and 16:09:03
25 So there's reference to data retention 16:06:14	25 that there are no known potential join keys between 16:09:09
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<p>1 REPORTER'S CERTIFICATE</p> <p>2 I, VICTORIA A GUERRERO, California Certified Shorthand</p> <p>3 Reporter, Registered Merit Reporter, Certified Realtime</p> <p>4 Reporter, do hereby certify that, pursuant to Federal Rules</p> <p>5 of Civil Procedure, STEVE GANEM appeared remotely before me</p> <p>6 at the time and place mentioned in the caption herein; that</p> <p>7 the witness was, by me, first duly sworn/affirmed under oath</p> <p>8 and examined upon oral interrogatories propounded by</p> <p>9 counsel;</p> <p>10 that said examination together with the testimony of</p> <p>11 said witness was taken down by me in stenotype and</p> <p>12 transcribed through computer-aided transcription; I further</p> <p>13 certify that I am not a relative or employee of any attorney</p> <p>14 of the parties, nor financially interested in the action;</p> <p>15 and the foregoing transcript, pages 1 through 109,</p> <p>16 review requested by the witness or a party, constitutes a</p> <p>17 full, true, and correct record of such testimony adduced and</p> <p>18 oral proceedings had and of the whole thereof</p> <p>19 WITNESS MY HAND AND DIGITAL SIGNATURE this Monday,</p> <p>20 March 28, 2022</p> <p>21 </p> <p>22</p> <p>23 Victoria A. Guerrero, CSR, RMR, CRR</p> <p>24 Oregon CSR No 14-0428 (exp 6-30-2023)</p> <p>25 Washington CCR No 3293 (exp 3-15-2023)</p> <p>California CSR No 8370 (exp 3-15-2023)</p> <p>Hawaii CSR No 490 (exp 12-31-2022)</p> <p style="text-align: right;">Page 110</p>	<p>1 <u>X</u> Federal R&S Requested (FRCP 30(e)(1)(B)) – Locked .PDF</p> <p>2 Transcript - The witness should review the transcript and</p> <p>3 make any necessary corrections on the errata pages included</p> <p>4 below, notating the page and line number of the corrections.</p> <p>5 The witness should then sign and date the errata and penalty</p> <p>6 of perjury pages and return the completed pages to all</p> <p>7 appearing counsel within the period of time determined at</p> <p>8 the deposition or provided by the Federal Rules.</p> <p>9 <u> </u> Federal R&S Not Requested - Reading & Signature was not</p> <p>10 requested before the completion of the deposition.</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p style="text-align: right;">Page 112</p>
<p>1 ALY OLSON, ESQ.</p> <p>2 alyolson@quinnemanuel.com</p> <p>3 MARCH 28, 2022</p> <p>4 RE: BROWN V. GOOGLE</p> <p>5 MARCH 23, 2022, STEVE GANEM, JOB NO. 5130916</p> <p>6 The above-referenced transcript has been</p> <p>7 completed by Veritext Legal Solutions and</p> <p>8 review of the transcript is being handled as follows:</p> <p>9 <u> </u> Per CA State Code (CCP 2025.520 (a)-(e)) – Contact Veritext</p> <p>10 to schedule a time to review the original transcript at</p> <p>11 a Veritext office.</p> <p>12 <u> </u> Per CA State Code (CCP 2025.520 (a)-(e)) – Locked .PDF</p> <p>13 Transcript - The witness should review the transcript and</p> <p>14 make any necessary corrections on the errata pages included</p> <p>15 below, notating the page and line number of the corrections.</p> <p>16 The witness should then sign and date the errata and penalty</p> <p>17 of perjury pages and return the completed pages to all</p> <p>18 appearing counsel within the period of time determined at</p> <p>19 the deposition or provided by the Code of Civil Procedure.</p> <p>20 <u> </u> Waiving the CA Code of Civil Procedure per Stipulation of</p> <p>21 Counsel - Original transcript to be released for signature</p> <p>22 as determined at the deposition.</p> <p>23 <u> </u> Signature Waived – Reading & Signature was waived at the</p> <p>24 time of the deposition.</p> <p>25</p> <p style="text-align: right;">Page 111</p>	<p>1 BROWN V. GOOGLE</p> <p>2 STEVE GANEM (#5130916)</p> <p>3 E R R A T A S H E E T</p> <p>4 PAGE <u> </u> LINE <u> </u> CHANGE <u> </u></p> <p>5 <u> </u></p> <p>6 REASON <u> </u></p> <p>7 PAGE <u> </u> LINE <u> </u> CHANGE <u> </u></p> <p>8 <u> </u></p> <p>9 REASON <u> </u></p> <p>10 PAGE <u> </u> LINE <u> </u> CHANGE <u> </u></p> <p>11 <u> </u></p> <p>12 REASON <u> </u></p> <p>13 PAGE <u> </u> LINE <u> </u> CHANGE <u> </u></p> <p>14 <u> </u></p> <p>15 REASON <u> </u></p> <p>16 PAGE <u> </u> LINE <u> </u> CHANGE <u> </u></p> <p>17 <u> </u></p> <p>18 REASON <u> </u></p> <p>19 PAGE <u> </u> LINE <u> </u> CHANGE <u> </u></p> <p>20 <u> </u></p> <p>21 REASON <u> </u></p> <p>22 <u> </u></p> <p>23 <u> </u></p> <p>24 WITNESS <u> </u> Date <u> </u></p> <p>25</p> <p style="text-align: right;">Page 113</p>